Attachment 8

Management of Accumulated Liquids in Container Storage Area

ENVIRONMENTAL DISPOSAL SYSTEMS, INC.

<u>7.20</u>

Secondary Containment and Drainage

Drainage for all container processing areas is shown on Figure 7.00-1. Figure 7.00-2 provides cross-sections for this area. Dimensions are provided on each of these drawings, as required, and each drawing is drawn to a scale. These plans show all secondary containment system features and how these features contain liquids and promote drainage. The container transport vehicle unloading area and all container handling areas have been designed to drain to the rainwater accumulation vault located just east of the container storage area. The container handling area will be designed with secondary containment curbs, pallets with built-in sump capacity for container storage with sump capacity, and walls in the container unloading area that will serve as secondary containment for a minimum of two percent of the total volume stored. The containers are stored in two separate areas. This area is sloped so that any spills generated will drain directly into the dry sump located within each storage area (see Figure 7.00-1, Drawing #M 1.02). The floors within the storage area are sloped away from the rest of the loading dock area, thereby preventing spills from entering other regions in the dock area. The dry sump vault for each area is capable of providing storage to contain over 10% of the volume of all containers being stored. These sumps are 12 feet by 3 feet in size and of 2.5 feet deep, providing a total storage volume of 1346 gallons, over ten percent of the total container volume to be handled. In addition to these sumps, the slope of the floor provides additional storage capacity to contain any spilled liquids.

The container process area, where the wastewater would be transferred to one of the receiving tanks, is maintained within separate containment. This area is 5 feet by 15.5 feet in plan dimensions, providing a separate storage volume of 290 gallons. Since only one container is processed at any given time, this containment volume is more than adequate to contain a leak from a full container, since maximum container size will be 100 gallons.

The sump vault for the storage area and the containment zone for the process areas will each be equipped with leak detection and level sensors to alert operating personnel of the presence of liquid. The wastewater collected in the sump at the storage area will be analyzed to determine it's characteristics and then pumped using a portable pump into spare containers. The collected

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wastewater will be stored within this area and treated through the treatment process, after compatibility with wastewaters in the storage tanks has been verified. Once the vault has been emptied, it will be throughly rinsed with water. The rinse water will be pumped to the storage tanks after compatibility has been verified by laboratory analysis.

Any spilled liquids in the container process area containment zone will be similarly pumped using a potable pump into spare drum containers. Once the characteristics and compatibility of the liquid has been determined, the collected wastewater will then be transferred to one of the storage tanks. Waste characteristic testing of spilled wastewater will be the same as required for all incoming wastewaters. If spills involve mixtures of different wastewaters, complete preacceptance testing will be required which will be identical to the testing required of a generator before a load is accepted for delivery to the facility. The process area will be throughly rinsed once all spilled liquids have been removed, with the rinse water being pumped into spare drums using the same portable pump and flexible hose connection.